

1 PATRICK D. ROBBINS (CABN 152288)
2 Acting United States Attorney

3 MARTHA BOERSCH (CABN 126569)
4 Chief, Criminal Division

5 IVANA DJAK (NYBN 5516687)
6 Assistant United States Attorney

7 1301 Clay Street, Suite 340S
8 Oakland, California 94612
Telephone: (510) 637-3918
FAX: (510) 637-3724
ivana.djak@usdoj.gov

9 Attorneys for United States of America

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 OAKLAND DIVISION

13 UNITED STATES OF AMERICA,) CASE NO. 25-CR-32 HSG
14 Plaintiff,)
15 v.) STIPULATION AND ORDER EXCLUDING
16 JASON NIOUS ,) TIME FROM MAY 21, 2025, TO JUNE 18,
17 Defendant.) 2025
18 _____)

19 It is hereby stipulated by and between counsel for the United States and counsel for the
20 defendant Jason Nious, that time be excluded under the Speedy Trial Act from May 21, 2025, through
21 June 18, 2025. At the status conference held on May 21, 2025, the government and counsel for the
22 defendant agreed that time be excluded under the Speedy Trial Act so that defense counsel could
23 continue to prepare, including by reviewing discovery and discussing possible resolutions and pleas with
24 the defendant and the government. For this reason and as further stated on the record at the status
25 conference, the parties stipulate and agree that excluding time until June 18, 2025, will allow for the
26 effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and
27 agree that the ends of justice are served by excluding the time from May 21, 2025, through June 18,
28 2025 from computation under the Speedy Trial Act outweigh the best interests of the public and the

STIPULATION AND ORDER TO CONTINUE STATUS AND EXCLUDE TIME
Case No. 25-CR-32 HSG

1 defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

2 The undersigned Assistant United States Attorney certifies that she has obtained approval from
3 counsel for the defendant to file this stipulation and proposed order.

4 IT IS SO STIPULATED.

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6 IT IS SO STIPULATED.

7 DATED: May 21, 2025

/s/

IVANA DJAK
Assistant United States Attorney

9 DATED: May 21, 2025

/s/

ELISSE LAROUCHE
Counsel for Defendant Jason Nious

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ORDER

2 Based upon the facts set forth in the stipulation of the parties and the representations made to the Court
3 on May 21, 2025 and for good cause shown, the Court finds that failing to exclude the time from May
4 21, 2025, through June 18, 2025, would unreasonably deny defense counsel and the defendant the
5 reasonable time necessary for effective preparation, taking into account the exercise of due diligence,
6 and continuity of counsel. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of
7 justice served by excluding the time from May 21, 2025, through June 18, 2025, from computation
8 under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial.
9 Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from May 21,
10 2025, through June 18, 2025, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C.
11 § 3161(h)(7)(A), (B)(iv).

12 IT IS SO ORDERED.

14 | DATED: 5/22/2025

Haywood S. Gilliam, Jr.
HON. HAYWOOD S. GILLIAM, JR.
United States District Judge